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and Universal Music Group, N.V.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LIZA GARDNER,

Plaintiff,

v.

SEAN COMBS,
AARON HALL,
DONALD EARLE DEGRATE J., AKA
DEVANTE SWING, UMG RECORDINGS, INC.,
UNIVERSAL MUSIC GROUP, N.V.,
JOHN DOES 1-10 (names being fictitious and used
to connote an unidentified person responsible for
this occurrence), JANE DOES 1-10 (names being
fictitious and used to connote an unidentified person
responsible for this occurrence), ABC
CORPORATIONS 1-10 (names being fictitious and
used to connote unidentified entities responsible for
this occurrence),

Defendants.

Civil Action No. 24-cv-07729

Oral Argument Requested

**DEFENDANTS UMG RECORDINGS INC. AND UNIVERSAL MUSIC GROUP, N.V.'S
NOTICE OF MOTION TO DISMISS COUNTS III-X OF THE AMENDED COMPLAINT
PURSUANT TO FED. R. CIV. P. 12(b)(2) AND 12(b)(6)**

PLEASE TAKE NOTICE that on March 3, 2025, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants UMG Recordings, Inc. and Universal Music Group, N.V. (“UMG Defendants”), shall move before the Honorable Leo M. Gordon, United States Judge of the United States Court of International Trade (sitting by designation in the United States District Court for the District of New Jersey), for an Order granting UMG Defendants’ Motion to Dismiss Counts III-X of the Amended Complaint Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6);

PLEASE TAKE FURTHER NOTICE that in support of this motion, UMG Defendants will rely on the Memorandum of Law in Support of the Motion to Dismiss Counts III-X of the Amended Complaint filed contemporaneously herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested pursuant to Local Rule 78.1; and

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Date: December 17, 2024

Respectfully submitted,

By: /s/ Jessica Greer Griffith

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on December 17, 2024, a true and correct copy of the foregoing Notice of Motion, together with copies of the supporting Memorandum of Law and proposed Order, were served on all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Jessica Greer Griffith
Jessica Greer Griffith